

**STATE OF VERMONT  
BOARD OF MEDICAL PRACTICE**

**In Re:** )  
Stephanie H. Taylor, M.D., ) **Docket Nos. MPS 45-0304, *et al.***  
Respondent )

**RESPONDENT'S MOTION REQUESTING AN  
ADDITIONAL ENLARGEMENT OF TIME**

**NOW COMES STEPHANIE H. TAYLOR, M.D.** Respondent, by and through her attorney, Peter G. Anderson, Esq., of Stowe, Vermont, and hereby requests that the Vermont Board of Medical Practice provide an additional enlargement of the time in which Respondent has to file a written response with the Board to the Specification of Charges filed by the Board on September 3, 2004. In support of her motion, Respondent states the following:

1. The Specification of Charges filed by the Vermont Board of Medical Practice on September 3, 2004 is thirty-nine pages in length. In addition, there are two exhibits attached to the Specifications as well as a twenty-seven page affidavit by Philip J. Ciotti, the Investigator for the Vermont Board of Medical Practice( hereinafter "the Board");

2. The Board's preparation of these charges began in April, 2004 and continued throughout the course of five or more months. Said charges are numerous, detailed, and fact-laden, the product of intensive research, investigation and drafting;

3. While Respondent has been diligently researching said charges, her ability to inspect and review documentation that will provide rebuttal evidence for her written response has been hampered by delays in the receipt of said materials from third parties;

4. In addition to documentation that she has independently requested, with this motion respondent is concurrently filing a Request for Production of Documents from the Vermont Board of Medical Practice for production of documents relevant to the charges that have been

alleged in this action. Once respondent is in receipt of said documentation, both the review and incorporation of said documentation into her response will take time.

5. Given that respondent has voluntarily consented to an extension of the period of summary suspension of her license to practice medicine pending a hearing on the merits, there is no prejudice to the State in the granting of an additional enlargement of time in which respondent may provide a written response.

**WHEREFORE**, Respondent requests that the Board of Medical Practice enlarge her time in which to provide a written response with the Board to these charges, allowing her 120 (one hundred twenty) additional days in which to respond, with said response due on or before March 7, 2005.

Dated at Stowe, Vermont, this 21<sup>st</sup> day of October, 2004.



**PETER G. ANDERSON, ESQ.**  
Attorney for Respondent  
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